

METEOR

Supplier Code of Conduct

Meteor Group

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Introduction

Meteor aims at achieving mutually beneficial supplier relationships built on shared values and actions. The supplier code of conduct for suppliers is based on our commitments and principles set in the Meteor Corporate Social Responsibility /Code of Conduct.

The Meteor Supplier Code of Conduct for suppliers is applicable to any party (regardless of where they conduct business) that contributes products, services, and other business activities to any entity within Meteor Group. These include suppliers, vendors, consultants, independent contractors, agents, or any other third party that acts in the interests or on behalf of Meteor –hereinafter known as “The supplier.”

The supplier automotive requires suppliers to uphold this set of principles and cascade them throughout their entire supply chain. It is the responsibility of the suppliers to ensure that their employees and their suppliers (e.g., subcontractors, representatives) of all supply chain levels are informed about and comply with the principles expressed in the suppliers’ code.

A. General Regulations

Anti-Corruption and Anti-Money Laundering

The supplier does not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. The Supplier does not facilitate or supports money laundering. We report any suspicious transactions and are alert for signs of money laundering.

Data Protection and Data Security

The supplier respects the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.

Financial Responsibility/Accurate Records

The supplier performs its business dealings in a transparent manner and accurately reflects them in the companies’ financial reports and filings. Suppliers should confirm an adequate financial reporting system control is in place.

Disclosure of Information

The supplier discloses financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

Conflicts of Interest

The supplier ensures that its employees avoid and disclose situations where their financial or other interests could conflict with job responsibilities, or situations giving any appearance of impropriety.

Counterfeit Parts

The supplier minimizes the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.

Intellectual Property

The supplier respects all valid intellectual property rights.

Export Controls, Trade, and Economic Sanctions:

The supplier complies with applicable restrictions on the export or re-export of goods, software, services, and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

Grievance Mechanism

The supplier establishes an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.

Remediation

The supplier provides for or cooperates in remediation through legitimate processes when its business activities cause or contribute to adverse environmental or social impacts.

Non-retaliation

The Supplier avoids any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly, and protest its business activities.

B. Environment

At Meteor we recognize the urgent need to address the impact of greenhouse gases (GHGs) on global warming. Energy efficiency is a crucial aspect of our efforts. We dedicated as well to embracing renewable energy sources. Furthermore, we are actively pursuing decarbonization throughout our value chain. By implementing emission reduction strategies, investing in low-carbon technologies, and collaborating with partners, we aim to minimize our carbon impact and foster a greener business ecosystem. We expect the supplier to have the same commitment.

Carbon Neutrality

The supplier strives to set science-based and time-bound emission reduction goals and renewable energy objectives that are aligned with the Paris Agreement and put in place measures that drive forward the decarbonization of the entire value chain.

Water Quality, Consumption & Management

The supplier minimizes water consumption, effectively reuses, and recycles water with responsible treatment of wastewater discharges and prevents potential impacts from flooding because of rainwater run-off, as required by and in accordance with applicable law.

Air Quality

The supplier routinely monitors and discloses, appropriately controls, minimizes, and to the extent possible, eliminates emissions contributing to air pollution, as required by and in accordance with applicable law. The Supplier assesses cumulative impacts of pollution sources at its facilities and mitigate its pollution levels accordingly.

Responsible Chemical Management

The supplier identifies, minimizes, and eliminates the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. The Supplier is also aware of any

use of restricted substances in processes and finished products, and actively investigates suitable substitutes to maintain product and environmental stewardship.

Circularity

The supplier promotes closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

Animal Welfare

The supplier respects the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be bred and killed for the single purpose of being used in an automotive product.

Biodiversity, Land Use and Deforestation

The supplier protects ecosystems, especially key biodiversity areas, impacted by its operations, and avoids illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.

Soil Quality

Where appropriate, the supplier monitors and controls its impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.

Noise Emissions

Where appropriate, the supplier monitors and controls the levels of industrial noise to avoid noise pollution.

C. Human Rights and Working Conditions

The supplier respects the human rights of workers, local communities, and other relevant stakeholders, prevents, and addresses adverse human rights impacts linked to its business activities, in accordance with the UN Guiding Principles on Business and Human Rights.

Child Labour and Young Workers

The supplier observes the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labour will not be tolerated in any form.

Wages and Benefits

The supplier provides their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave, and government-mandated benefits.

Working Hours

The supplier complies with local laws and collective bargaining agreements (where applicable) regarding working hours or should comply with the ILO Standards on Working Time* in the absence of relevant local regulations.

Modern Slavery

The supplier prohibits any forms of forced, bonded or compulsory labour, including human trafficking.

Ethical Recruiting

The supplier does not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

Freedom of Association and Collective Bargaining

The supplier allows workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. The Supplier respects worker rights to associate freely, to join or not join labour unions, bargain collectively, seek representation and join workers' councils.

Non-Discrimination and Harassment

The supplier does not tolerate any form of discrimination or harassment in respect of employment and occupation and provides equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information, or marital status.

Diversity, Equity, and Inclusion

The supplier develops and promotes inclusive cultures where diversity is valued and celebrated, and everyone can contribute fully and reach their full potential. The Supplier encourages diversity in all levels of their workforce and leadership, including boards of directors.

Rights of Minorities and Indigenous Peoples and Women's Rights

The supplier respects the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with consideration for the presence of vulnerable groups. The supplier provides equal opportunity in employment and commits to equal pay for equal work.

Land Rights and Forced Eviction

The supplier avoids forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests, and waters.

Private or Public Security Forces

The supplier does not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

D. Health and Safety

The supplier provides workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health. The Supplier implements a management system for a safe and healthy working environment.

Workspace

The supplier provides a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.

Personal Protective Equipment

Where applicable, The Supplier provides its workforce with necessary Personal Protective Equipment (PPE) and ensures that the personnel understands how and when it needs to be applied.

Emergency Preparedness

The Supplier reduces the risk of occupational hazards and develops an emergency preparedness and response plan.

Incident and Accident Management

The supplier implements hazard and risk analysis systems to minimize the potential for incidents or accidents at the workplace. An investigation system drives to determine the root cause, and a corrective action system ensures all permanent measures have been taken to minimize the chance of a recurrence.

Contractors

The Supplier agrees to effectively manages the health and safety of contractors as part of a company's extended supply chain. The Supplier coordinates its procurement processes to identify hazards and to assess and control risks arising from the contractor's business activity with The Supplier, and the company's business activity that impacts the contractors' workers.

Machine Safety & Workplace ergonomics

As a responsible supplier, safe use, and maintenance of machinery in the workplace a crucial aspect of our commitment in reducing the number of accidents and injuries in the workplace. We understand that regular maintenance plays a vital role in preventing malfunctions, minimizing downtime, and ensuring a safe working environment for our employees.

Through our commitment to workplace ergonomics with the aim of reducing strain, fatigue, and injuries, we aim to create a culture that promotes employee well-being, reduces the risk of injuries, by improving product design and workspace arrangements. This includes desk height, chair height, manual handling, and heavy lifting.

Handling of chemicals and/or biological substances

We provide guidance to our employees on how to handle chemicals and/or biological substances without harm to health. We strive to adequately control exposure to agents/substances, both chemical and biological, in the workplace, which cause ill health.

Fire protection

In ensuring the safety of building occupants and assets, fire protection systems are vital. The Supplier ensures that the workplace has smoke alarms, fire exit signs and lighting, fire escape ladders and if necessary, and fire prevention systems such as fire extinguishers and sprinklers.

E. Responsible Supply Chain Management

The supplier selects business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles along the supply chain. The Supplier implements a supplier management system.

Due Diligence

The supplier conducts due diligence on its direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promotes transparency and traceability and uses its best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.

Responsible Sourcing of Raw Materials and Minerals

The supplier sources raw materials and minerals used in its products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Fair Competition and Anti-Trust Compliance

Supplier agrees to commit itself to fair competition practices and adherence to anti-trust laws and regulations. The Supplier requires these standards from its suppliers as well. Suppliers are required to define and implement similar fair competition and anti-trust standards within their own supply chains, specifically targeting their tier-1 suppliers. These requirements aim to foster fair competition while promoting sustainability in the supply chain, creating a level playing field for all stakeholders involved.

F. Execution of Code of Conduct

For the execution of standards of this Code of Conduct the Supplier implements processes and trains all employee to the intentional behaviour.

Forced Labour

To prevent any kind of forced labour, the local plant managers revise working conditions of employees, business partners and suppliers on a regular base. This happens in a reasonable pattern and only in an expected and accepted way. No executive of the Supplier can hire employees from a suspicious source if there is any doubt to promote forced labour.

Child work

The work conditions and legal requirements of employees under the age of eighteen refer to local legal restrictions. The local executives are responsible to comply with the law. Children under the age of fifteen are prohibited in manufacturing areas.

Harassment

Physical integrity and human dignity are ultimate purposes of the Supplier for the employees. The Supplier stands for a zero tolerance against any kind of harassment. Whenever any local executive gains knowledge, that an employee suffers from corporal punishment, sexual, mental, or verbal

harassment he/she immediately must intervene. The offender must be punished with further labour and legal consequences.

Compensation

Local HR Managers report minimum legal compensation to the local executives. Local HR is responsible to check minimum wage and compare with the local salary levels at The Supplier. Before any contractor can collaborate with The Supplier, local HR must ensure, that the contractors pay minimum wages. Pay checks must be clear and easy to understand.

Working Hours

Local HR provides adequate measures to keep and document the working hours at The Supplier. A measure is adequate if it is either digital or paper based and fulfils the local legal requirements. Local executives are responsible for granting sufficient time for recovery to the employees.

Antidiscrimination

Local HR provides non-discrimination work environment and diverse and non-discriminating internal and external recruiting processes. Local executives supervise the processes.

Health and Safety

Local executives are responsible to ensure and improve health and safety standards due to local legal requirements. In addition, The Supplier sets ambitious standards for a healthy and safe work environment. Further standards are directed by internal operating instruction papers, trainings, and on-going safety instructions. Only fulfilling minimum standards is not satisfying for The Supplier.

Freedom to form a coalition.

No employee will be discriminated by the fact, that he is a member of a union, works council, or party. The Supplier allows union work in patterns and under the restrictions of law.

Environment

The supplier supports and enhances the “Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain.” Local executives make sure, that the principles are known by local management teams and that the guiding principles are implemented in all sequential steps of the supply chain. Further local legal requirements are prior to the principles.

Bockenem, June 2023